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March 1, 2021

VIA ECF

Hon. Analisa Torres
United States District Judge
Southern District of New York
500 Pearl Street
New York, NY 10007

Re: *Girotto v. Anine Bing Corp. and BLDG Gansvoort LLC* (SDNY - No. 21 CV 00031)

Dear Judge Torres:

Our law firm was just retained as counsel for Defendant BLDG Gansvoort LLC (“BLDG”) in this action. Pursuant to ¶¶ 1.A. B. and C. of your Honor’s Individual Practices, we request that the Court adjourn for 30 days through and including March 31, 2021 the time in which BLDG may answer, move or otherwise respond to the Complaint. We also request that the Court adjourn the scheduled March 9, 2021 initial status conference (and submission of a case management plan) to a mutually convenient date after BLDG has responded to the Complaint. Plaintiff’s counsel consents to these requests.

We make these requests to allow us time (1) to investigate and prepare a response to the Complaint and (2) to explore whether the case may be resolved without pleading or discovery to avoid wasting resources.

According to the Court’s docket Defendant’s response to the Complaint was originally due January 29, 2021. This is the first request to adjourn that response.

We thank Your Honor for considering these requests.

Respectfully,

Eric D. Witkin

cc: All Counsel of Record (via ECF)